

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re:

KLMKH, Inc.,  
a North Carolina corporation,

Debtor.

Case No. 22–30102

Chapter 11  
Subchapter V

***EX PARTE* MOTION BY THE DEBTOR  
TO SHORTEN NOTICE FOR HEARING  
ON THE DEBTOR’S MOTION TO EXTEND THE PERIOD FOR  
FILING SCHEDULES AND THE STATEMENT OF FINANCIAL AFFAIRS**


PURSUANT TO LBR 9013-1, debtor-in-possession KLMKH, Inc. respectfully requests the Court to shorten notice so that the Court can conduct a hearing on the debtor’s motion, filed today (Doc. 13; the “Motion to Extend”), to extend deadlines pursuant to Fed. R. Bankr. P. 1007(a)(5).

1. The matters that are the subject of the Motion to Extend are already on for hearing on Tuesday, March 29, 2022, under the Order to Show Cause entered on March 11, 2022 (Doc. 6).

2. The undersigned prospective counsel for KLMKH does not expect the hearing on the Motion to Extend to last more than 15 minutes.

WHEREFORE, KLMKH, Inc. requests that the Court, on an *ex parte* basis, shorten notice and order that the Court will conduct the hearing on the Motion to Extend at the Court's regular Chapter 11 hearing day of March 29, 2022.

March 24, 2022

A handwritten signature in cursive script, reading "Bradley E. Pearce", is positioned above a horizontal line.

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*Prospective Counsel for KLMKH, Inc.*

### CERTIFICATE OF SERVICE

The undersigned certifies that the preceding document has been served on (I) all parties and parties-in-interest receiving notice by the Court's electronic filing or case management system (if applicable), and (II) the parties identified below or listed on the service matrix attached hereto (if one is so attached) by: (a) hand delivery, if so indicated; (b) depositing a copy of such document with the United States Postal Service, first-class United States mail, postage prepaid, at the addresses listed below or on the attached service list; (c) telecopy, at the fax number listed beside each party so identified below; or (d) depositing the foregoing document with a designated delivery service authorized by 26 U.S.C. § 7502(f)(2), addressed to the party identified below or on the attached service list, and by obtaining a delivery receipt.

March 24, 2022

A handwritten signature in cursive script, reading "Bradley E. Pearce", is written over a horizontal line.

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